



Filed Electronically Via ECFS 2/16/2011  
EB Docket 06-36

February 16, 2011

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

**Reference: EB-06-TC060, Certification of CPNI Filing of West Kentucky Rural Telephone Cooperative Corporation, Inc.**

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of West Kentucky Rural Telephone Cooperative Corporation, Inc. (499 Filer ID 807297).

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in cursive script that reads 'Martin Clift'.

Martin Clift  
Regulatory Manager  
West Kentucky Rural Telephone Cooperative Corporation, Inc.  
270-674-1000, x279  
[mclift@wk.net](mailto:mclift@wk.net)



**West Kentucky and Tennessee  
Telecommunications Cooperative**

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**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2011 covering the prior calendar year 2010

Date filed: February 9, 2010

Name of company(s) covered by this certification: West Kentucky Rural Telephone Cooperative Corporation, Inc.

Form 499 Filer ID: 807297

Name of signatory: Trevor R. Bonnstetter

Title of signatory: Chief Executive Officer

I, Trevor Bonnstetter certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

Signed

A handwritten signature in black ink, appearing to read 'T. Bonnstetter', written over a horizontal line.

## **WEST KENTUCKY RURAL TELEPHONE COOPERATIVE CORPORATION CPNI USAGE POLICY STATEMENT**

Pursuant to Section 64.2009(e) of the Federal Communications Commission's rules this statement explains how Ardmore Telephone Company, Inc. operating procedures ensure compliance with Part 64, Subpart U, of the FCC's rules.

The company has policies procedures in effect that protect the usage and dissemination of CPNI. CPNI is only accessible by authorized personnel, who interface directly with customers, in the customary course of business.

The company has written instructions on accessing, usage, and protection of CPNI.

Company personnel that have access CPNI have been trained in its use, and protection.

Call detail information is generally not available to customers. Call detail information is only provided pursuant to a written request validated by authorized management personnel.

Customers that access the company center in person must disclose a valid photo ID to access their call records. Telephone access is provided with name and address, and call detail information is only provided, with written consent. There is no on-line access available to consumers at the present time.

Procedures are in place for all marketing material prior to implementation to be reviewed by supervisory personnel and executives to ensure that CPNI data if used is properly protected, and if required, notice and authorization provided by its customers. No marketing activities were engaged in 2010 that used CPNI.

The company does not released CPNI information to third parties for marketing or any other purpose.

Employees that may misuse CPNI information are subject to disciplinary action as specified in the Company Employee Manual. An affirmation statement is required by all new employees that they have read the Manual and understand its terms.

There are no security CPNI breaches to report.